

Christopher R. Miltenberger
Nevada Bar No. 10153
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive, Suite 600
Las Vegas, Nevada 89135
Telephone: (702) 792-3773
Facsimile: (702) 792-9002
Email: miltenbergerc@gtlaw.com

Jeffrey P. Dunning
Pro Hac Vice
GREENBERG TRAURIG, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60601
Telephone: (312) 456-6612
Facsimile: (312) 899-0351
Email: dunningj@gtlaw.com

Counsel for Defendant PHWLTV, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Aladdin's Eatery Systems, Inc., an Ohio
corporation,

Plaintiff,

v.

PHWLTV, LLC a Nevada limited liability
company; and OPBIZ, LLC, Nevada
limited liability company,

Defendants.

Case No. 2:18-cv-00412 APG-GWF

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANT PHWLTV, LLC TO
RESPOND TO AMENDED
COMPLAINT FOR DECLARATORY
JUDGMENT**

(First Request)

Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Defendant PHWLTV, LLC ("PHWLTV") and Plaintiff Aladdin's Eatery Systems, Inc ("Plaintiff"), by and through their respective counsel, hereby stipulate and agree to extend the deadline for Defendant PHWLTV to plead or otherwise respond to Plaintiff's Amended Complaint for Declaratory Judgment (Doc. #31) ("Amended Complaint") until June 4, 2020, and request that the Court enter an Order approving the same. This is the parties' first request for an extension of the deadline to respond to the Amended Complaint since the entry of the Court's Order on PHWLTV's Motion to Dismiss Amended Complaint on April 20, 2020 (Doc. #48).

1 On March 22, 2019, the Court entered an Order (Doc. #30) granting PHWLV's Motion to
2 Dismiss Plaintiff's Complaint Pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6) (Doc. #21), and
3 providing Plaintiff until April 12, 2019 to file an Amended Complaint.

4 On April 12, 2019, Plaintiff timely filed its Amended Complaint (Doc. #31).

5 On June 10, 2019, PHWLV filed a Motion to Dismiss the Amended Complaint (Doc. #40),
6 which motion was thereafter fully briefed by the parties.

7 On April 20, 2020, the Court entered an Order (Doc. #48) denying PHWLV's Motion to
8 Dismiss Amended Complaint. As a result, the current deadline for PHWLV's response to
9 Plaintiff's Amended Complaint is May 4, 2020.

10 At this time, the parties are engaged in ongoing settlement discussions. As a result,
11 PHWLV has requested an additional extension until June 4, 2020 to enable the parties to pursue a
12 potential settlement. This is PHWLV's first request for an extension of its deadline to respond to
13 the Amended Complaint since the entry of an Order denying PHWLV's Motion to Dismiss
14 Amended Complaint. Plaintiff has agreed to the requested extension as a matter of professional
15 courtesy and in light of the parties' ongoing discussions.

16 This Stipulation is entered into in good faith and is not intended to delay these proceedings.
17 The parties will not be prejudiced by this Stipulation and the parties are in agreement with respect
18 to PHWLV's requested extension.

19 ///

20 ///

21 ///

Based on the foregoing, good cause exists to grant PHWLTV's request and the parties respectfully request that the Court enter an order extending the deadline for PHWLTV to plead or otherwise respond to the Amended Complaint until June 4, 2020.

Dated: April 28th, 2020

Dated: April 28th, 2020

By: /s/ Christopher R. Miltenberger

Christopher R. Miltenberger
Nevada Bar No. 10153
GREENBERG TRAURIG, LLP
10845 Griffith Peak Drive
Suite 600
Las Vegas, NV 89135

Jeffrey P. Dunning
Pro Hac Vice
GREENBERG TRAURIG, LLP
77 West Wacker Drive, Suite 3100
Chicago, IL 60601

Attorneys for Defendant PHWLTV, LLC

By: /s/ Edward T. Saadi

Edward T. Saadi, Esq.
Pro Hac Vice
EDWARD T. SAADI, LLC
970 Windham Court, Suite 7
Boardman, OH 44512

Jeffrey A. Cogan
Nevada Bar No. 4569
JEFFREY A. COGAN, ESQ., LTD.
6900 Westcliff Drive, Suite 502
Las Vegas, Nevada 89145

*Attorneys for Plaintiff Aladdin's Eatery
Systems, Inc.*

IT IS SO ORDERED:


**UNITED STATES
MAGISTRATE/DISTRICT JUDGE**

DATED: 4/29/2020